

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BAR 25, LLC)	CASE NO. 1:13-cv-00665
)	
Plaintiff,)	JUDGE LESLEY WELLS
v.)	
)	
BEER MARKET ONE, LLC)	
)	
and)	
)	
RHUMBLINE, LLC)	
)	
Defendants.)	

**CONSENTED MOTION FOR EXTENSION OF TIME TO PLEAD, MOVE OR
OTHERWISE RESPOND TO COMPLAINT**

On March 26, 2013, Plaintiff, Bar 25, LLC, filed a complaint alleging trademark infringement against Defendants, The Beer Market, LLC and Rhumbline Holdings, LLC (“the Complaint”).

After conferring with counsel for Plaintiff and securing consent, undersigned counsel for Defendants has filed two unopposed motions to extend the time to respond to the Complaint, most recently to and including June 21, 2013, both of which this Court granted.

Counsel for the parties have been engaged in substantive discussions directed to attempting to settle this matter and believe they are continuing to make meaningful progress, which would be aided by a further extension of the time by which Defendants must respond to the Complaint. Counsel for Plaintiff has consented to this request for an extension of thirty (30) days to respond to the Complaint.

Accordingly, Defendants respectfully request a further extension of thirty (30) days, up to and including July 22, 2013,¹ in which to plead, move or otherwise respond to the Complaint. This Motion is filed to enable the parties to devote their efforts and resources to pursuing a possible settlement of this matter and not for purposes of delay.

Thus, for good cause shown, Defendants respectfully request that the Court grant this consented motion for an extension of time, up to and including June 22, 2013, in which Defendants may plead, move or otherwise respond to the Complaint.

Respectfully submitted,

By: /s/ Daniel J. McMullen
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Attorneys for Defendants

Dated: June 19, 2013

¹ July 21, 2013 is a Sunday. See Fed. R. Civ. P. 6(a)(1).

CERTIFICATE OF SERVICE

A copy of the foregoing Unopposed Motion for Extension of Plead, Move or Otherwise Respond to Complaint was filed electronically this 19th day of June, 2013. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

/s/ Daniel J. McMullen
One of the Attorneys for Defendants